

# **Exhibit C**

K&L GATES

October 20, 2021

Thomas E. Birsic  
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**Via Email (jschlerf@travelers.com)**

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Janis E. Schlerf  
Senior Account Executive  
Travelers  
111 Schilling Road  
Hunt Valley, Maryland 21031

**Insured:**       **Murphy Oil Corporation**  
**Lawsuits:**    ***Michael E. Lockman, et al. v. Pioneer Natural Resources USA, Inc., et al., Case No. 4:20-cv-00067-BMM-JTJ (D. Mont. Great Falls Division)***  
                  ***Zimmerman, Inc. et al. v. Murphy Exploration & Production Co., et al., Case No. 4:20-cv-00068-BMM-JTJ (D. Mont. Great Falls Division)***

Dear Ms. Schlerf:

This letter acknowledges and responds to your September 2, 2021 letter in which USF&G agreed to participate in the defense of Murphy Oil in the Montana Lawsuits. Thank you for reconsidering USF&G's initial coverage decision regarding this matter. Like USF&G, Murphy Oil reserves all of its rights in connection with the USF&G insurance policies at issue in connection with this claim.

Attached please find a spreadsheet summarizing Murphy Oil's defense costs incurred to date in connection with the Montana Lawsuits (\$1,208,381.46), along with supporting invoices. As you know, Foster Garvey is Murphy Oil's lead defense counsel for the Montana Lawsuits. Foster Garvey has represented Murphy Oil in matters related to the East Poplar Field for over three decades. Murphy Oil's local counsel is Crowley Fleck. Like Foster Garvey, Crowley Fleck has represented Murphy Oil in matters related to the East Poplar Field for several decades. Crowley Fleck is also providing extensive help with discovery at lower rates than Foster Garvey.

Murphy Oil has also retained several expert consultants/vendors to assist with the Montana Lawsuits. HydroSolutions is Murphy Oil's principal hydrology consultant. Murphy Oil has worked with HydroSolutions since the 1980s. In that time, HydroSolutions has developed an extensive database of information regarding the surface water, groundwater and deepwater formations in and around the East Poplar Field. More recently, HydroSolutions coordinated a

groundwater sampling project in connection with the Montana Lawsuits. Murphy Oil has also retained Chemistry Matters to assist HydroSolutions and possibly provide expert testimony in connection with the Montana Lawsuits. Lighthouse is Murphy Oil's electronic discovery vendor. Lighthouse has helped with document scanning, organization and review, as well as with electronic searches of various Murphy Oil databases. Over the next few weeks, Murphy Oil will likely add two additional experts/vendors regarding local property values and values for crops/cattle, etc.

By copy of this letter, Murphy Oil asks USF&G to reimburse it for defense costs incurred to date in connection with the Montana Lawsuits. Also, per your request, attached please find a copy of the 1955-1956 USF&G insurance policy for your review.

Sincerely,

A handwritten signature in black ink, appearing to read 'T. Birsic', with a long horizontal flourish extending to the right.

Thomas E. Birsic